

**UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

In re:

ASHINC Corporation, et al.,

Debtor.

Chapter 11

Case No. 12-11564 (CSS)
(Jointly Administered)

CATHERINE E. YOUNGMAN, LITIGATION
TRUSTEE FOR ASHINC CORPORATION, ET
AL., AS SUCCESSOR TO THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS
OF ASHINC CORPORATION, AND ITS
AFFILIATED DEBTORS,

Plaintiff,

v.

YUCAIPA AMERICAN ALLIANCE FUND I,
LLC, YUCAIPA AMERICAN MANAGEMENT,
LLC, AMERICAN AIRLINES MASTER FIXED
BENEFIT PENSION PLAN TRUST,
AMERICAN PRIVATE EQUITY PARTNERS II,
LP, AUTOMOTIVE MACHINISTS PENSION
TRUST, BOARD OF FIRE AND POLICE
PENSION COMMISSIONERS OF THE CITY OF
LOS ANGELES, CALIFORNIA PUBLIC
EMPLOYEES' RETIREMENT SYSTEM,
CARPENTERS PENSION TRUST FUND FOR
NORTHERN CALIFORNIA, COLLIER
PARTNERS 702 LP INCORPORATED, CLOUSE
S.A., CONSOLIDATED RETIREMENT FUND,
IAM PRIVATE EQUITY, LLC, ILGWU DEATH
BENEFIT FUND 4, INTERNATIONAL SIF
SICAV SA, LOCALS 302 & 612 OF THE
INTERNATIONAL UNION OF OPERATING

Adv. Pro. No. 21-51179

C.A. No. 1:22-cv-00302-CFC

ENGINEERS – EMPLOYERS CONSTRUCTION INDUSTRY RETIREMENT TRUST, LOS ANGELES CITY EMPLOYEES’ RETIREMENT SYSTEM, NATIONAL RETIREMENT FUND, NEW MEXICO STATE INVESTMENT COUNCIL, NEW MEXICO STATE INVESTMENT COUNCIL LAND GRANT PERMANENT FUND, NEW MEXICO STATE INVESTMENT COUNCIL SEVERANCE TAX PERMANENT FUND, NEW YORK CITY EMPLOYEES’ RETIREMENT SYSTEM, NEW YORK CITY FIRE DEPARTMENT PENSION FUND, NEW YORK CITY POLICE PENSION FUND, NORTHEAST CARPENTERS PENSION FUND, PACIFIC COAST ROOFERS PENSION PLAN, SANBA II INVESTMENT AUTHORITY, STATE STREET BANK AND TRUST COMPANY (AS TRUSTEE ON BEHALF OF AMERICAN AIRLINES MASTER FIXED BENEFIT PENSION PLAN TRUST); STEAMSHIP TRADE ASSOCIATION OF BALTIMORE, INC. – INTERNATIONAL LONGSHOREMEN’S ASSOCIATION (AFL-CIO) PENSION FUND, TEACHERS’ RETIREMENT SYSTEM OF THE CITY OF NEW YORK, UNITED FOOD AND COMMERCIAL WORKERS INTERNATIONAL UNION PENSION PLAN FOR EMPLOYEES, WESTERN CONFERENCE OF TEAMSTERS PENSION TRUST

Defendants.

NOTICE OF WITHDRAWAL OF COUNSEL

Please take notice Erin R. Fay of Bayard, P.A. hereby withdraws as counsel to the LP Defendants listed on Schedule 1 attached hereto in this action and may be removed from the docket and service list.

PLEASE TAKE FURTHER NOTICE that this withdrawal is limited to Erin R. Fay and does not impact the representation of the LP Defendants by other Bayard, P.A. attorneys in the above-captioned matter.

Dated: March 2, 2023
Wilmington, Delaware

BAYARD, P.A.

/s/ Gregory J. Flasser

Gregory J. Flasser (No. 6154)

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Counsel to the LP Defendants

Schedule 1
(“LP Defendants”)

1. American Airlines Master Fixed Benefit Pension Plan Trust
2. American Private Equity Partners II, LP
3. California Public Employees’ Retirement System
4. Carpenters Pension Trust Fund For Northern California
5. Collier Partners 702 LP Incorporated
6. Clouse S.A.
7. Consolidated Retirement Fund
8. IAM Private Equity, LLC
9. ILGWU Death Benefit Fund 4
10. International SIF SICAV SA
11. Locals 302 & 612 Of The International Union Of Operating Engineers – Employers
Construction Industry Retirement Trust
12. National Retirement Fund
13. New Mexico State Investment Council
14. New Mexico State Investment Council Land Grant Permanent Fund
15. New Mexico State Investment Council Severance Tax Permanent Fund
16. New York City Employees’ Retirement System
17. New York City Fire Department Pension Fund
18. New York City Police Pension Fund
19. Northeast Carpenters Pension Fund
20. Pacific Coast Roofers Pension Plan
21. Sanba II Investment Company
22. State Street Bank And Trust Company (As Trustee On Behalf Of American Airlines Master
Fixed Benefit Pension Plan Trust)
23. Steamship Trade Association Of Baltimore, Inc. – International Longshoremen’s
Association (AFL-CIO) Pension Fund
24. Teachers’ Retirement System Of The City Of New York
25. United Food And Commercial Workers International Union Pension Plan For Employees
26. Western Conference Of Teamsters Pension Trust